



AIR 03-608

STATE OF WASHINGTON
DEPARTMENT OF HEALTH
DIVISION OF RADIATION PROTECTION

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June 20, 2003

Mr. Joel B. Hebdon, Director
U. S. Department of Energy
Regulatory Compliance
and Analysis Division
P. O. Box 550 MSIN A 5-58
Richland, Washington 99352

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Dear Mr. Hebdon:

Per WAC 246-247-080 (1), which authorizes the department to require an ALARACT demonstration at any time, the department is requiring such a demonstration concerning the process change in the Plutonium Finishing Plant described in 03-RCA-0220.

The bases for the ALARACT demonstration requirements are the ALARACT standards given in WAC 246-247-040, the definition of ALARACT given in WAC 246-247-030 and in WAC 246-247-130, which describes the purpose, scope and standards. It is the applicant's responsibility to demonstrate the effectiveness of their ALARACT determination to the department. The department may adjust this demonstration procedure on a case-by-case basis, as needed, to ensure compliance with the substantive standard. The department has determined that this demonstration must be expanded to ensure that the projects being performed in the Plutonium Finishing Plant fully comply with this standard, at a minimum.

This ALARACT demonstration shall contain the following information:

1. Documentation that supports the assertion that this activity meets the routine, day-to-day operational and replacement-in-kind activities associated with an approved process identified in a radioactive air emissions Notice of Construction (NOC, DOE/RL-99-77, Revision 0G) and as defined in WAC 246-247-030(22) and (23).
2. Documentation to support the assertion that there is no change in the annual possession quantity throughout.
3. Documentation (including assumptions and basis) that there is not a change in the potential-to-emit (PTE).

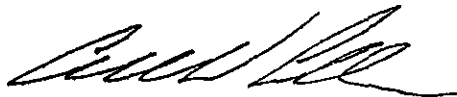
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Mr. Joel B. Hebdon
AIR 03-608
June 20, 2003
Page 2

4. Documentation (including assumptions and basis) that this activity is not a "modification" (i.e., any physical change in, or change in the method of operation that could increase the amount of radioactive materials emitted or may result in the emissions of any radionuclide not previously emitted.)
5. Documentation (including assumptions and basis) that the equipment changes to be made to the process meets the definition of replacement-in-kind (i.e., substitution of existing systems, equipment, components, or devices of an emission unit's control technology with systems, equipment, components, or devices with equivalent, or better, performance specifications that will perform the same function(s)).
6. Documentation (including assumptions and basis) that the equipment changes to be made to the process meets the definition of routine (i.e., maintenance, repair, or replacement-in-kind performed on a systems equipment, components, or devices of an emission unit's abatement technology as a planned part of an established inspection, maintenance, or quality assurance program that does not increase the emission unit's operating design capacity; or normal day-to-day operations of the facility).

This ALARACT demonstration shall be completed and submitted to the department for review no later than August 1, 2003.

Sincerely,



Allen W. Conklin, Supervising Health Physicist
Air Emissions and Defense Waste Section
Division of Radiation Protection

AWC/JWS/jr

cc: Rick Poeton, EPA
Stephen Lijek, Ecology
Oliver Wang, Ecology
Earl Fordham, WDOH
Nick Ceto, EPA

Fax: WDOH-Hanford June 20, 2003